



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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To: Janice Mueller, State Auditor
22 E. Mifflin St., Ste. 500
Madison, WI 53703

Subject: Legislative Audit Bureau Chronic Wasting Disease (CWD) Audit

Dear Ms. Mueller:

Thank you for the opportunity to comment on the audit of the State of Wisconsin's Chronic Wasting Disease (CWD) management programs. More than 640,000 hopeful deer hunters are preparing for the 2006 gun deer season that opens next weekend. A lot of deer camps will be talking about CWD and what Wisconsin should do about it. It's a conversation well worth having. A healthy deer herd is important to all of us.

The Departments of Natural Resources (DNR), Agriculture, Trade and Consumer Protection (DATCP), Health and Family Services (DHFS), and the Wisconsin Veterinary Diagnostic Lab (WVDL) have invested more than \$32 million since February 2002 to reduce the negative impact of this disease to our state. It's a sizeable and deliberate investment that we believe is warranted given what Wisconsin has at stake. White-tailed deer are not just Wisconsin's state animal, they are a powerful economic engine that contributes an estimated one billion dollars every year to our economy. Wisconsin is home to 650 deer farms; the livelihood of those farm families depends upon a healthy deer herd both inside and outside of their fences. CWD is a prime example of a disease that affects both Wisconsin's wildlife resources and the animal agriculture industry. A serious animal disease that impacts Wisconsin's wildlife is not good for Wisconsin agriculture and vice versa.

The audit documents that despite significant state efforts, the wild deer herd remains abundant in the CWD-infected areas and the prevalence of the disease has not decreased. It is very clear that CWD is not going to be eradicated in wild deer herds in the near future. Surveys repeatedly show that Wisconsinites don't want CWD to spread in our state. Your audit report challenges us to find additional disease management tools that are effective at containing CWD. This won't be easy. You've documented that even with unprecedented 60-100 day gun deer hunting seasons; deer remain abundant within the CWD-infected areas of our state. An abundant deer population facilitates disease transmission and provides a source for disease sparks to disperse outward in our state. If we can achieve successful containment of CWD, there is hope for further control down the road.

Wisconsin's CWD accomplishments

In 2002, when Wisconsin became the 1st state east of the Mississippi River to find CWD, the news shocked both our state and the country. DNR, DHFS, and DATCP immediately collaborated and we reached out to national experts to build Wisconsin's initial response. We find your statement *"Without exception, every scientist and researcher with whom we spoke believed that, given the information available in 2002, Wisconsin's approach to combating CWD was reasonable and appropriate"*

reassuring. Wisconsin received a lot of advice, but no one handed us a roadmap. We've continued our collaborative approach both within state government and with neighboring states since 2002. We believe that our efforts have built a solid foundation upon which Wisconsin's next phase of CWD management can be built. The accomplishments include:

- Building a **solid base of CWD surveillance data** on the distribution or prevalence of CWD within Wisconsin. The audit found that 50% of DNR's \$26.8 million in CWD costs since 2002 was spent on testing 99,917 deer to determine the geographic distribution of the disease and to monitor changes in prevalence within CWD-infected areas. This **extensive testing has bolstered hunter confidence and put deer back on the dinner table instead of in the dumpster**. Similarly, 14,654 farm-raised deer have been tested during this time allowing deer farms to document the health of their herds and take action where CWD was found.
- Wisconsin Veterinary Diagnostic Lab **creating a USDA-approved, state-of-the-art CWD testing facility that annually has led the nation in the number of CWD tests** it performs. They have recently migrated to even better facilities at the UW-Madison Veterinary School.
- Completing a **baseline audit of Wisconsin's deer farms** and working with the deer farm industry to implement **comprehensive health monitoring regulations** to protect captive and wild deer herds. These regulations have helped identify CWD-infected animals and depopulate several infected captive herds.
- Implementing **five years of expanded hunting season frameworks and \$580,000 in financial incentives to encourage increased deer hunter participation in disease control**. Investing \$336,000 to build a **venison pantry program** for the CWD zones that tests all donated adult deer. Spending \$671,000 to enforce **baiting and feeding regulations in order to reduce the risk of disease transmission**.
- Obtaining legislative authority in spring 2006 to reduce disease spread risks by regulating the disposal of deer carcasses from CWD-infected areas, as well as, **obtaining authority to indemnify landfills for accepting CWD-positive carcasses**. Landfilling carcasses is safe and, if we can successfully negotiate landfill indemnity agreements, we could reduce waste disposal costs by 75%.
- Providing **factual information on the human health risks related to CWD including instructional information on proper meat handling techniques**; ongoing surveillance of the incidence of Cruetzfeldt-Jakob cases in Wisconsin; and **establishment of a registry of Wisconsin citizens that have consumed venison from CWD-positive deer**.
- **Building a comprehensive Wisconsin CWD research program** that is examining the vulnerability of deer to CWD by genotype, age and sex; describing the role soil plays in environmental CWD contamination; documenting deer movement, survival and dispersal; developing disease modeling using Wisconsin data to predict likely disease patterns; providing deer tissues to develop new testing techniques and understanding attitudes of hunters and landowners toward CWD.

CWD Challenges Ahead

Your report correctly observes that, *“Wisconsin’s approach differs from that of other states for a number of reasons, including DNR’s aggressive approach to combating CWD, the large size of Wisconsin’s deer herd, the importance of hunting to Wisconsin’s economy, and desire to provide hunters with some level of confidence that the animals they harvest are likely free of the disease.”*

Wisconsin does have a lot at stake with this disease and our agencies’ combined effort reflects that. Yet, we can’t equate effort with successful disease outcomes. Significant challenges still lay ahead in our state’s efforts to deal with this disease.

What is needed to contain (prevent further spread) CWD in Wisconsin? – I have indicated that the DNR will lead a public dialogue on this very question in 2007. The response of Wisconsin’s citizens will impact every corner of our state and generations to come. CWD surveillance has identified disease “sparks” out ahead of the core area of CWD infection. These sparks represent the advancing front of the disease and can become new core areas of disease. We must engage the public in identifying what additional tools or techniques should be applied to snuff out our identified sparks and reduce the intensity of the disease in our core areas.

Whether one lives in Douglas County or Iowa County, CWD challenges impact all Wisconsin citizens. Similarly, deer hunters and non-hunters alike will share the consequences. If the geographic area affected by CWD grows, so do our shared challenges. There will be an even greater desire for testing of hunter-killed deer increasing costs to either the state, hunters, or both. The cost of the venison pantry program will also increase as up-front CWD testing would be mandatory across a larger area. CWD deer carcass disposal procedures will need to be applied to larger areas and a larger volume of deer. More of Wisconsin’s farms, raising deer and other livestock, will operate with CWD-positive deer as neighbors. Finally, as your audit reports, we remain very aware that *“...while CWD is not currently known to cause illness in humans, it is not possible to predict with certainty that CWD will never cause a human disease.”* For this reason, there is a distinct public health interest in minimizing the number of people who might consume venison from CWD-positive animals.

Can costs be reduced if the disease spreads? Your audit documented that 65.6% percent (\$21.1 million) of the CWD management expenses to date were funded from Segregated Revenues, nearly all of which came from the Fish & Wildlife Account which is funded by hunting and fishing license fees. Another 17% came from Federal Revenues. The future viability of these funding sources will certainly be a challenge, especially if CWD spreads. As you reported in the audit, testing deer amounted to about 50% of the \$32.3 million spent by the State of Wisconsin. A doubling of the geographic area infected by CWD would drive testing costs well beyond existing state and federal funding sources ability to support such testing.

We are committed to seeking and implementing cost-saving measures wherever possible. We’ll work hard to deliver a cost-effective CWD management program. We recognize, however, that our ability to drive costs down depends to a large extent upon technological advancements (faster, cheaper tests) and the availability of less expensive ways of disposing of carcasses.

How can we turn public support for disease control to action? – University surveys of hunter attitudes in both CWD-infected zones and the rest of the state have consistently shown strong support for controlling CWD and not letting it spread. However, Dr. Robert Holsman and Robert Smail, UW- Stevens Point, have documented that those desires for CWD control are superseded by other factors when hunters are hunting within CWD zones. When hunters in the CWD Eradication Zone were asked what factors determine how many deer they decide to shoot, the “desire to help eradicate CWD” ranked lower than a

variety of factors including the amount of venison they wanted, number of deer seen, the opportunity to shoot bucks, conservation of the resource, and the time they had available to hunt.

Existing attitudinal or social norms are imposing limits on the harvest threshold of hunters and landowners within the CWD-infected areas. This is a very significant challenge to CWD management. We need to develop the messages, tools and strategies that effectively control this disease.

We have learned a lot about CWD in the past five years and our accomplishments have helped Wisconsin deal with this disease. We could not have come as far as we did without strong cooperation among state agencies, or help from our neighboring states and federal partners. As we go forward, continued cooperation will be vital.

We must also continue to learn from and build on the foundation of science we have begun and adapt our management to the new findings. Our success in managing CWD is vital for the health of our natural resources and for our future economic and social well-being.

Sincerely,

Scott Hassett, Secretary
WI Dept of Natural Resources